

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re: § **Chapter 11**
SPHERATURE INVESTMENTS LLC, § **Case No.: 20-42492**
et al. §
Debtors. § **Jointly Administered**

**JOINT MOTION FOR ENTRY OF
AGREED CONFIDENTIALITY AND PROTECTIVE ORDER**

Plaintiffs, Spherature Investments LLC d/b/a WorldVentures Holdings, LLC and its affiliated Debtors (collectively, “**WorldVentures**”) and Defendant, Kenneth E. Head (“**Head**,” who along with WorldVentures will be referred to as the “**Parties**”), jointly move for entry of the Agreed Confidentiality and Protective Order (“**Order**”) attached to this motion as Exhibit A, and in support thereof state as follows:

¹ The “**Debtors**” in the above-captioned jointly administered chapter 11 bankruptcy cases and the adversary proceeding are: Spherature Investments LLC (“**Spherature**”) EIN#5471; Rovia, LLC (“**Rovia**”) EIN#7705; WorldVentures Marketing Holdings, LLC (“**WV Marketing Holdings**”) EIN#3846; WorldVentures Marketplace, LLC (“**WV Marketplace**”) EIN#6264; WorldVentures Marketing, LLC (“**WV Marketing**”) EIN#3255; WorldVentures Services, LLC (“**WV Services**”) EIN#2220.

1. This lawsuit relates to WorldVentures' lifestyle business including its membership-based travel products and services that are marketed and sold through its network of sales representatives.

2. Many of the documents potentially relevant in this matter may contain proprietary, confidential and trade secret information of the Parties, as well as sensitive and confidential information of this parties ("Confidential Material"). The Parties move for entry of the Order to protect the dissemination and use of the Confidential Information while facilitating discovery in this matter.

3. The Order has been drawn narrowly so that only information warranting protection is covered by the Order.

4. The Parties join in the Order, approve the form of the Order and agree to abide by the terms of the Order. This agreement is indicated by each of the Parties' signature on the Order and this motion.

WHEREFORE, WorldVentures and Head respectfully request that the Court enter the Agreed Confidentiality and Protective Order attached here to as Exhibit A.

DATED: March 4, 2021

Respectfully submitted by:

By: /s/Todd Hoodenpyle
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SPHERATURE INVESTMENTS LLC, *et al*
d/b/aWORLDVENTURES HOLDINGS, LLC

CERTIFICATE OF SERVICE

I hereby certify that, on March 4, 2021, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Steven C. Lockhart
Steven C. Lockhart